ERIC A. LIEPINS. 12770 Coit Road, Suite 1100 Dallas, Texas 75251

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PROPOSED COUNSEL FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

| IN RE | § | |
|----------------------|---|----------------------|
| | § | |
| ARUBA PETROLEUM, INC | § | |
| | § | Case no. 16-42121-11 |
| | § | CHAPTER 11 |
| DEBTOR | § | |

EMERGENCY MOTION TO COMPEL PAYMENT

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Aruba Petroleum. Inc. (the "Debtor") moves, on an emergency basis to compel payment of funds, and in support thereof, respectfully states:

- 1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core matter. The Court has authority to grant the relief requested herein pursuant to 11 U.S.C. §§ 105 and 362.
- 2. The Debtor filed bankruptcy, seeking protection under Chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") on November 21, 2016 (the "Petition Date").
- 3. The Debtor is an operator of approximately 250 oil and gas wells in Texas.

4. AS the operator the Debtor is responsible receiving payments from sale of oil and gas and

disbursing those payments to the interest holders.

5. Prior to the bankruptcy filing, the Debtor notified Texas Energy Management ("TEM") that

all payments for oil & gas purchases should be directed to Aruba.

6. On or about November 29, 2016 Aruba received the attached correspondence from TEM that

it was suspending payments to Aruba.

7. Receipt of these payments is critical not only to the ability of the Debtor to continue

operations, but also to enable the Debtor to preforms its fiduciary duties to the interest

holders.

8. Debtor requests that the Court enter an order direct TEM to make payments on the oil & gas

purchases from well operated by Aruba directly to Aruba..

WHEREFORE, PREMISES CONSIDERED the Debtor requests that the Court enter an

order directing that TEM remit Debtor its payments and for such other and further relief as is just.

Respectfully submitted,

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By: _/s/ Eric Liepins__

Eric A. Liepins

Texas State Bar No. 12338110

PROPOSED COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing motion was served on Texas Energy Management, 214-696-8635 and to all other creditors via United States mail on the 8th day of December 2016.

__/s/ Eric Liepins____ Eric A. Liepins